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**BY ECF**

Chief Magistrate Judge Cheryl L. Pollak  
Chambers Room 1230  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Ahamed v. 563 Manhattan Inc., et al.  
1:19-cv-06388-EK-CLP Defendants' Request  
To Submit a Sur-Reply re: New Issues Raised

Dear Chief Magistrate Judge Pollak:

I represent all Defendants in this matter and respectfully request Defendants' the opportunity to file the attached Sur-Reply to Plaintiff's Motion for Sanctions (ECF 114).

In Plaintiff's Declaration in support, for the first time he provides Defendants with much-belated discovery and may have perjured himself by now claiming a video was served in 2020.

Defendants respectfully request the opportunity to file their Sur-Reply, attached hereto as Exhibit "A."

Respectfully Submitted,

*Michael L. Ferch*  
Michael L. Ferch, Esq.  
Counsel for Defendants

cc: Zachary J. Liska, Esq. (via ECF)